

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BACKERTOP LICENSING LLC,

Plaintiff,

v.

CANARY CONNECT, LLC,

Defendant.

Civil Action No.: 1:22-cv-00572-CFC

BACKERTOP LICENSING LLC,

Plaintiff,

v.

AUGUST HOME, INC.,

Defendant.

Civil Action No.: 1:22-cv-00573-CFC

**NOTICE OF COMPLIANCE REGARDING RESPONDENT
RONALD W. BURNS' PRODUCTION IN RESPONSE TO
THIS COURT'S JUNE 8, 2023, ORDERS TO PRODUCE**

The undersigned, Ronald W. Burns ("Respondent"), sent his responses and objections to this Court's production orders on July 17, 2023 - for delivery to Judge Connolly's chambers on July 18, 2023, via UPS Next Day Air (tracking number 1Z88XA180163765637)(the "Response").

As detailed in the responses and objections accompanying the document production, Respondent was prepared to respond to this Court's previous production orders on July 12, 2023. On July 7, 2023, however, Respondent received email communication from Lori LaPray ("LaPray") of Backertop

Licensing, LLC (“Backertop”), indicating that attorney David Finger was being retained to represent both LaPray and Backertop “going forward in these cases.” That same email communication further instructed Respondent “to return to return to Backertop any and all documents and communications pertaining to Backertop, and to not make any production of documents to Judge Connolly in these cases, including, without limitation, the documents requested to be produced by July 12, as any such production may moot the above-referenced notice of objection and prejudice Backertop.”

On July 12, attorney David Finger entered an appearance on behalf of Backertop and LaPray. That same day, Mr. Finger entered Backertop’s Objections (Canary ECF No. 48, August Home ECF No. 52) in both matters, noting that both Respondent and Mr. Chong were instructed by Backertop not to produce documents.

Subsequent communication from Mr. Finger, received Monday afternoon (7/17), indicated that Backertop reconsidered its position, and granted its permission for Respondent to make and file the ordered production.

As such, Respondent sent their production, overnight, to Judge Connolly’s chambers, including 3307 pages of documents saved to a thumb drive.

The undersigned Respondent avers that they have made diligent efforts to search for, and produce, all responsive documents. Respondent avers that they are aware of, and compliant with, its present and ongoing obligations to produce all responsive documents.

July 18, 2023

RESPONDENT ATTORNEY

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/s/ Jimmy Chong

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Licensing LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 18, 2023 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Jimmy Chong
Jimmy Chong